

EXHIBIT I

RESPONSE:

The Debtors are in ongoing discussions with BSEE regarding INC remedial work.

INTERROGATORY NO. 19

Please identify the person(s) who prepared the document produced as FWE-00000016, produced to the Sureties on March 31, 2021, setting forth their full name, the company they work for and their position at the company.

RESPONSE:

Garrett Galloway and Jordan Schuler prepared FWE-00000016.

INTERROGATORY NO. 20

Please set forth whether the Debtors intend to assume and assign any of the existing surety bonds. If so, provide details, and set forth all cure amounts to be satisfied in connection with any such proposed assumption and/or assignment, and set forth how any assignee will demonstrate that it will provide the sureties with adequate assurance of future performance, including providing indemnity, payment of bond premiums, and satisfaction of exoneration and quia timet collateralization obligations.

RESPONSE:

Neither the Plan nor Disclosure Statement provide that any bonds will be split, assumed, assigned, or otherwise transferred. To the extent a surety has any claims against the Debtors that become allowed, such claims will be treated in accordance with the Plan.

INTERROGATORY NO. 21

Please set forth the Debtors' position on whether the surviving entities (FWE I, FWE III, FWE IV) under the divisive merger(s) will need to or will obtain their own (new) surety bonds.

RESPONSE:

The Debtors' position is that these entities may require area-wide operator bonds.

INTERROGATORY NO. 22

Please set forth the substance of any and all communications with any governmental entity with respect to the obtaining of financial assurance/bonding for FWE I, FWE III, FWE IV and Credit Bid Purchaser. In your answer please include (1) the date of the communication, (2) the time of the communication, (3) the parties to the communication and individuals with knowledge of the communication, and (4) the substance of the communication.

RESPONSE:

None.

INTERROGATORY NO. 23

Please set forth the Debtors' position on whether the surviving entities (FWE I, FWE III, FWE IV) contend that they will be the principals on any existing bonds post-confirmation. If any of the surviving entities do intend to be principals on certain bonds, provide a list of each bond and the associated surviving entity which is intended to be the principal.

RESPONSE:

The Debtors object to this Request as premature and calling for speculation about future events.

INTERROGATORY NO. 24

Please set forth the Debtors' position on how the existing surety bonds are intended to be allocated amongst the buckets under the Plan. For example, if a BOEM bond is for a lease which interest is being split between two or more entities, how will the BOEM bond be allocated to those entities, and do the Debtors have regulatory approval for such allocation. Please provide an answer for all bonds that have bonded assets being split between two or more entities under the Plan.

RESPONSE:

Neither the Plan nor Disclosure Statement provide that any bonds will be split, assumed, assigned, or otherwise transferred.

INTERROGATORY NO. 25

Please advise whether it is the Debtors' intent to reject each of the surety bond indemnity agreements in the Bankruptcy Cases.

RESPONSE:

The indemnity agreements are not executory contracts.

INTERROGATORY NO. 26

Please identify in which class of claims the Plan places Apache.

RESPONSE:

Class 6B.